

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. 9004-2(c)

KIRSTEN B. ENNIS, LLC

50 Division Street, Suite 102

Somerville, NJ 08876

(908) 713-0345

mail@ennislegal.com

Kirsten B. Ennis, Esq. (KE7927)
Attorney for Michelle Geiger, Debtor(s)

In re:

Michelle Geiger, Debtor(s)

Case No.: 15-27781

Chapter 13

Judge: Hon. Christine M. Gravelle

Hearing Date: 11/6/2019 at 9:00 a.m.

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following (choose one):

1. Motion for Relief from the Automatic Stay filed by US Bank, creditor,

A hearing has been scheduled for 11/6/2019, at 9:00 a.m.

OR

Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____ m.

Certification of Default filed by _____, creditor,

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (choose one):

Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached hereto.

Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**): _____

Other (**explain your answer**): Debtor had to pay daughters college expenses causing her to fall behind. Debtor proposes to resume regular monthly mortgage payments on November 1, 2019 and continue paying monthly. In February 2020, she will pay her arrears with her income tax refund.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 10/23/19

/s/ Michell Geiger
Debtor's Signature

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within fourteen (14) days of the filing of a *Creditor's Certification of Default*.